

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**IN RE: REALPAGE, INC., RENTAL  
SOFTWARE ANTITRUST LITIGATION  
(NO. II)**

**Case No. 3:23-MD-3071  
MDL No. 3071**

**This Document Relates to:**

**3:22-cv-01082  
3:23-cv-00332  
3:23-cv-00357  
3:23-cv-00378  
3:23-cv-00410  
3:23-cv-00413  
3:23-cv-00552  
3:23-cv-00742  
3:23-cv-00979**

**Chief Judge Waverly D. Crenshaw, Jr.**

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**DEFENDANT LINCOLN PROPERTY COMPANY'S ANSWER AND  
AFFIRMATIVE DEFENSES TO PLAINTIFFS' SECOND AMENDED  
CONSOLIDATED CLASS ACTION COMPLAINT**

Pursuant to Rules 7 and 8 of the Federal Rules of Civil Procedure, Defendant Lincoln Property Company<sup>1</sup> (“Lincoln”), by and through the undersigned counsel, hereby answers Plaintiffs’ Consolidated Second Amended Class Action Complaint (“Complaint”), Dkt. No. 530, as follows:

**PRELIMINARY STATEMENT**

All factual allegations are denied unless expressly admitted. Admissions are limited to specific facts addressed, and not to any characterizations, conclusions, or inferences from those facts, or to the relevance of any admission of facts relative to the merits of the action or claims purportedly set forth in the Complaint.

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<sup>1</sup> Lincoln’s Residential Division is now known as Willow Bridge Property Company.

Any acknowledgement that the Complaint purports to characterize or quote particular documents is not an admission as to the authenticity of any document, nor an adoption of its contents, nor an admission of any other fact or conclusion averred by Plaintiffs.

Solely for the reader's convenience, Lincoln has organized this Answer to correspond with the headings, subheadings, and numbering used within the Complaint. In doing so, Lincoln does not admit that the headings or subheadings are factually accurate, and to the extent any such headings or subheadings can be read to contain factual allegations to which an answer is required, Lincoln denies each and every one of the allegations. In addition, the Complaint contains footnotes. To the extent the contents of those footnotes are not addressed in the text of the response to the Complaint paragraph to which the footnote relates and/or to the extent that the content of any footnote can be read to contain factual allegations, Lincoln denies each and every one of them. The numbers below correspond to the paragraph numbers in Plaintiffs' Complaint.

## I. INTRODUCTION

**ANSWER TO PARAGRAPH 1:** Paragraph 1 purports to characterizes a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information to determine the truth of any such allegations in paragraph 1 and thus denies them. To the extent paragraph 1 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 1.

**ANSWER TO PARAGRAPH 2:** To the extent paragraph 2 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 2 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 2.

**ANSWER TO PARAGRAPH 3:** Lincoln denies that the definition in paragraph 3 of “Owner-Operator” is accurate. From time to time, Lincoln does own a limited number of properties for a period of time for which it does act as an owner and property manager. To the extent paragraph 3 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 3 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 3.

**ANSWER TO PARAGRAPH 4:** Paragraph 4 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 4 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 4 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 4.

**ANSWER TO PARAGRAPH 5:** Paragraph 5 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 5 and thus denies them. To the extent paragraph 5 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 5 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 5.

**ANSWER TO PARAGRAPH 6:** To the extent paragraph 6 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 6 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 6.

**ANSWER TO PARAGRAPH 7:** Paragraph 7 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 7 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations of paragraph 7 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 8:** Paragraph 8 contains legal assertions for which no response is required. To an extent a response is required, Paragraph 8 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 8 and thus denies them. To the extent paragraph 8 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 8 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 8.

## **II. BACKGROUND**

**ANSWER TO PARAGRAPH 9:** Paragraph 9 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 9 and thus denies them. To the extent paragraph 9 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 9 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 9.

**ANSWER TO PARAGRAPH 10:** Paragraph 10 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in

paragraph 10 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 10 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 10.

**ANSWER TO PARAGRAPH 11:** Paragraph 11 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 11 and thus denies them. To the extent paragraph 11 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 11 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 11.

**ANSWER TO PARAGRAPH 12:** To the extent paragraph 12 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 12 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 12.

**ANSWER TO PARAGRAPH 13:** Paragraph 13 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 13 and thus denies them. To the extent paragraph 13 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 13 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 13.

**ANSWER TO PARAGRAPH 14:** To the extent paragraph 14 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 14 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 14.

**ANSWER TO PARAGRAPH 15:** Paragraph 15 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 15 and thus denies them. To the extent paragraph 15 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 15 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 15.

**ANSWER TO PARAGRAPH 16:** Paragraph 16 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 16 and thus denies them. To the extent paragraph 16 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 16 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 16.

**ANSWER TO PARAGRAPH 17:** Paragraph 17 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 17 and thus denies them. To the extent that paragraph 17 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 17 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 17.

**ANSWER TO PARAGRAPH 18:** To the extent paragraph 18 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 18 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 18.

**ANSWER TO PARAGRAPH 19:** To the extent paragraph 19 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 19 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 19.

**ANSWER TO PARAGRAPH 20:** Paragraph 20 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 20 and thus denies them. Lincoln denies the allegations in paragraph 20 specific to Lincoln. To the extent paragraph 20 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 20 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 20.

**ANSWER TO PARAGRAPH 21:** Paragraph 21 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 21 and thus denies them. To the extent paragraph 21 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 21 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 21.

**ANSWER TO PARAGRAPH 22:** Paragraph 22 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 22 and thus denies them. To the extent paragraph 22 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 22 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 22.

**ANSWER TO PARAGRAPH 23:** Paragraph 23 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 23 and thus denies them. To the extent paragraph 23 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 23 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 23.

**ANSWER TO PARAGRAPH 24:** Paragraph 24 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 24 and thus denies them. To the extent paragraph 24 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 24 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 24.

**ANSWER TO PARAGRAPH 25:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 25 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 26:** Paragraph 26 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 26 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 26 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 27:** Paragraph 27 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 27 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 27 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 28:** Paragraph 28 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 28 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 28 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 29:** To the extent paragraph 29 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 29 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 29.

**ANSWER TO PARAGRAPH 30:** To the extent paragraph 30 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 30 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 30.

**ANSWER TO PARAGRAPH 31:** To the extent paragraph 31 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 31 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 31.

**ANSWER TO PARAGRAPH 32:** To the extent paragraph 32 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 32 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 32.

**ANSWER TO PARAGRAPH 33:** Paragraph 33 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 33 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 33 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 34:** Paragraph 34 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 34 and thus denies them. To the extent paragraph 34 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 34 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 34.

**ANSWER TO PARAGRAPH 35:** Paragraph 35 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations

in paragraph 35 and thus denies them. To the extent paragraph 35 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 35 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 35.

**ANSWER TO PARAGRAPH 36:** Paragraph 36 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 36 and thus denies them. Lincoln lacks knowledge or information to form a belief as to the truth of the allegations in paragraph 36 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 37:** Paragraph 37 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 37 and thus denies them. To the extent paragraph 37 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 37 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 37.

**ANSWER TO PARAGRAPH 38:** Paragraph 38 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 38 and thus denies them. To the extent paragraph 38 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 38 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 38.

**ANSWER TO PARAGRAPH 39:** Paragraph 39 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 39 and thus denies them. Lincoln denies the allegations in paragraph 39 specific to Lincoln. To the extent paragraph 39 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 39 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 39.

**ANSWER TO PARAGRAPH 40:** Paragraph 40 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 40 and thus denies them. To the extent paragraph 40 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 40 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 40.

**ANSWER TO PARAGRAPH 41:** To the extent paragraph 41 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 41 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 41.

**ANSWER TO PARAGRAPH 42:** Paragraph 42 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 42 and thus denies them. To the extent paragraph 42 contains allegations that do not

pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 42 and, on that basis, denies them. Lincoln denies all allegations in paragraph 42.

**ANSWER TO PARAGRAPH 43:** Paragraph 43 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 43. To the extent paragraph 43 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 43 and, on that basis, denies them. Lincoln denies all allegations in paragraph 43.

### **III. JURISDICTION AND VENUE**

**ANSWER TO PARAGRAPH 44:** Paragraph 44 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 44. To the extent paragraph 44 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 44 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 45:** Lincoln is not presently challenging the Court's subject matter jurisdiction over this action.

**ANSWER TO PARAGRAPH 46:** Paragraph 46 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln is not presently challenging venue in this District.

**ANSWER TO PARAGRAPH 47:** Lincoln admits that it has transacted business in this District. Lincoln is not currently challenging personal jurisdiction in this District. To the extent paragraph 47 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 47 and, on that basis, denies them. Except as expressly admitted, Lincoln denies the allegations in paragraph 47.

**ANSWER TO PARAGRAPH 48:** Paragraph 48 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 48. To the extent paragraph 48 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 48 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 49:** Paragraph 49 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 49.

#### **IV. THE PARTIES**

**ANSWER TO PARAGRAPH 50:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 50 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 51:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 51 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 52:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 52 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 53:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 53 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 54:** Lincoln admits that Plaintiff Brandon Watters rented a unit at 2010 West End in Nashville, Tennessee for a lease term beginning on August 14, 2021. Lincoln further admits that Lincoln managed the property at that location for some period of time. Paragraph 54 further purports to characterize Plaintiff Watters's leases. Lincoln refers the Court to the documents which speak for themselves. To the extent paragraph 54 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 54 and, on that basis, denies them. Except as expressly admitted, Lincoln denies any remaining allegations of paragraph 54.

**ANSWER TO PARAGRAPH 55:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 55 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 56:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 56 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 57:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 57 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 58:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 58 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 59:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 59 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 60:** Lincoln admits that Plaintiff Maya Haynes rented a unit at Seven Springs for a lease term beginning on August 4, 2020. Lincoln further admits that Lincoln managed the property at that location for some amount of time. Paragraph 60 purports to characterize Plaintiff Haynes's leases and a notice. Lincoln refers the Court to the documents which speak for themselves. To the extent paragraph 60 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 60 and, on that basis, denies them. Except as expressly admitted, Lincoln denies any remaining allegations of paragraph 60.

**ANSWER TO PARAGRAPH 61:** Paragraph 61 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 61 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 61 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 62:** Paragraph 62 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 62 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 62 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 63:** Paragraph 63 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 63 and thus denies them.

**ANSWER TO PARAGRAPH 64:** Paragraph 64 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 64 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 64 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 65:** Paragraph 65 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 65 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 65 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 66:** Paragraph 66 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 66 and thus

denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 66 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 67:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 67 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 68:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 68 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 69:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 69 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 70:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 70 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 71:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 71 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 72:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 72 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 73:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 73 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 74:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 74 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 75:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 75 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 76:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 76 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 77:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 77 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 78:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 78 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 79:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 79 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 80:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 80 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 81:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 81 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 82:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 82 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 83:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 83 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 84:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 84 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 85:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 85 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 86:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 86 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 87:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 87 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 88:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 88 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 89:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 89 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 90:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 90 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 91:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 91 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 92:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 92 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 93:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 93 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 94:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 94 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 95:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 95 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 96:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 96 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 97:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 97 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 98:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 98 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 99:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 99 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 100:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 100 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 101:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 101 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 102:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 102 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 103:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 103 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 104:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 104 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 105:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 105 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 106:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 106 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 107:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 107 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 108:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 108 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 109:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 109 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 110:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 110 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 111:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 111 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 112:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 112 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 113:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 113 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 114:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 114 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 115:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 115 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 116:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 116 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 117:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 117 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 118:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 118 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 119:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 119 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 120:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 120 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 121:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 121 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 122:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 122 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 123:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 123 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 124:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 124 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 125:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 125 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 126:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 126 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 127:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 127 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 128:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 128 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 129:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 129 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 130:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 130 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 131:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 131 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 132:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 132 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 133:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 133 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 134:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 134 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 135:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 135 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 136:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 136 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 137:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 137 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 138:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 138 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 139:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 139 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 140:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 140 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 141:** Lincoln denies that the definition of “Owner-Operator” is accurate. Lincoln admits that Lincoln Property Company was an operating name on behalf of a Delaware limited liability company headquartered in Dallas, Texas. As stated above, Lincoln is now known as Willow Bridge Property Company. Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations

with respect to it. Except as expressly admitted, Lincoln denies any remaining allegations of paragraph 141.

**ANSWER TO PARAGRAPH 142:** Lincoln admits that Michelle Artz is Vice President of Revenue Management at Lincoln. Lincoln admits Yieldstar is used for some of the properties it manages. Except as expressly admitted, Lincoln denies the allegations of paragraph 142.

**ANSWER TO PARAGRAPH 143:** Lincoln denies the allegations of paragraph 143.

**ANSWER TO PARAGRAPH 144:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 144 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 145:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 145 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 146:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 146 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 147:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 147 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 148:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 148 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 149:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 149 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 150:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 150 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 151:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 151 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 152:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 152 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 153:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 153 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 154:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 154 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 155:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 155 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 156:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 156 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 157:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 157 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 158:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 158 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 159:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 159 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 160:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 160 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 161:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 161 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 162:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 162 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 163:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 163 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 164:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 164 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 165:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 165 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 166:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 166 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 167:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 167 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 168:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 168 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 169:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 169 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 170:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 170 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 171:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 171 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 172:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 172 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 173:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 173 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 174:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 174 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 175:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 175 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 176:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 176 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 177:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 177 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 178:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 178 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 179:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 179 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 180:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 180 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 181:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 181 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 182:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 182 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 183:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 183 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 184:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 184 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 185:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 185 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 186:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 186 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 187:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 187 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 188:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 188 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 189:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 189 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 190:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 190 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 191:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 191 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 192:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 192 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 193:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 193 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 194:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 194 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 195:** Paragraph 195 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 195. To the extent paragraph 195 contains factual allegations that do not pertain to

Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegation in paragraph 195 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 196:** Paragraph 196 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln denies the allegations in paragraph 196.

**ANSWER TO PARAGRAPH 197:** To the extent paragraph 197 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegation in paragraph 197 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 197.

**ANSWER TO PARAGRAPH 198:** Lincoln denies that the definition in paragraph 198 of “Owner-Operator” is accurate. Lincoln does own certain properties in its portfolio for which it does act as a property manager. To the extent paragraph 198 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegation in paragraph 198 and, on that basis, denies them. Lincoln denies any allegations in paragraph 198 specific to Lincoln. Lincoln denies any remaining allegations of paragraph 198.

**ANSWER TO PARAGRAPH 199:** To the extent paragraph 199 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 199 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 199.

**ANSWER TO PARAGRAPH 200:** Paragraph 200 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 200. To the extent paragraph 200 contains factual allegations that do not pertain to

Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegation in paragraph 200 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 201:** To the extent paragraph 201 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegation in paragraph 201 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 201.

## **V. FACTUAL ALLEGATIONS**

### **A. Historical Competition Among Residential Property Managers.**

**ANSWER TO PARAGRAPH 202:** Paragraph 202 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 202 and thus denies them. To the extent paragraph 202 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in 202 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 202.

**ANSWER TO PARAGRAPH 203:** To the extent paragraph 203 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in 203 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 203.

**ANSWER TO PARAGRAPH 204:** Paragraph 204 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 204 and thus denies them. To the extent paragraph 204 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in 204 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 204.

**ANSWER TO PARAGRAPH 205:** Paragraph 205 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 205. To the extent paragraph 205 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in 205 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 205.

**ANSWER TO PARAGRAPH 206:** Paragraph 206 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 206 and thus denies them. To the extent paragraph 206 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in 206 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 206.

**ANSWER TO PARAGRAPH 207:** Paragraph 207 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 207 and thus denies them. To the extent paragraph 207 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in 207 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 207.

## **B. Evolution of RealPage's Revenue Management Solutions.**

**ANSWER TO PARAGRAPH 208:** Paragraph 208 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 208 and thus denies them. To the extent paragraph 208 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 208 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 208.

**ANSWER TO PARAGRAPH 209:** Paragraph 209 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 209 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 209 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 210:** Paragraph 210 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 210 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 210 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 211:** Paragraph 211 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 211 and thus denies them. To the extent paragraph 211 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 211 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 211.

**ANSWER TO PARAGRAPH 212:** To the extent paragraph 212 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 212 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 212.

**ANSWER TO PARAGRAPH 213:** Paragraph 213 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 213 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 213 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 214:** Paragraph 214 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 214 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 214 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 215:** Paragraph 215 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 215 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 215 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 216:** Paragraph 216 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or

information sufficient to determine the truth of any such allegations in paragraph 216 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 216 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 217:** Paragraph 217 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 217 and thus denies them.

**ANSWER TO PARAGRAPH 218:** Paragraph 218 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 218 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 218 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 219:** Paragraph 219 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 219 and thus denies them. To the extent paragraph 219 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 219 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 219.

**ANSWER TO PARAGRAPH 220:** Paragraph 220 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in

paragraph 220 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 220 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 221:** Paragraph 221 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 221 and thus denies them. Lincoln lacks knowledge or information to form a belief as to the truth of any remaining allegations in paragraph 221 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 222:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 222 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 223:** Paragraph 223 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 223 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to any remaining allegations in paragraph 223 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 224:** Paragraph 224 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 224 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 224 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 225:** Paragraph 225 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in

paragraph 225 and thus denies them. To the extent paragraph 225 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 225 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 225.

**ANSWER TO PARAGRAPH 226:** Paragraph 226 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 226 and thus denies them.

**C. Property Management Companies Effectively Outsourced Pricing and Supply Decisions to RealPage, Eliminating Competition.**

**ANSWER TO PARAGRAPH 227:** To the extent paragraph 227 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 227 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 227.

**ANSWER TO PARAGRAPH 228:** Paragraph 228 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 228 and thus denies them.

**ANSWER TO PARAGRAPH 229:** Paragraph 229 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 229 and thus denies them. To the extent paragraph 229 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the allegations in paragraph 229 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 229.

**ANSWER TO PARAGRAPH 230:** Paragraph 230 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 230 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 230 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 231:** Paragraph 231 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 231. To the extent paragraph 231 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 231 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 231.

**ANSWER TO PARAGRAPH 232:** To the extent paragraph 232 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 232 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 232.

**ANSWER TO PARAGRAPH 233:** Paragraph 233 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 233 and thus denies them. To the extent paragraph 233 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 233 and, on that basis, denies them. Lincoln denies the

allegations in paragraph 233 specific to Lincoln. Lincoln denies any remaining allegations of paragraph 233.

**ANSWER TO PARAGRAPH 234:** Paragraph 234 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 234 and thus denies them. To the extent paragraph 234 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 234 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 234.

**ANSWER TO PARAGRAPH 235:** Paragraph 235 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 235 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 235 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 236:** Paragraph 236 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 236 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 236 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 237:** To the extent paragraph 237 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 237 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 237.

**ANSWER TO PARAGRAPH 238:** To the extent paragraph 238 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 238 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 238.

**ANSWER TO PARAGRAPH 239:** To the extent paragraph 239 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 239 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 239.

**ANSWER TO PARAGRAPH 240:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 240 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 241:** To the extent paragraph 241 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 241 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 241.

**ANSWER TO PARAGRAPH 242:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 242 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 243:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 243 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 244:** Paragraph 244 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 244. To the extent paragraph 244 contains factual allegations that do not pertain to

Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 244 and, on that basis, denies them. Lincoln denies any remaining allegations in Paragraph 244.

**ANSWER TO PARAGRAPH 245:** To the extent paragraph 245 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 245 and, on that basis, denies them. Lincoln denies the allegations in paragraph 245 specific to Lincoln. Lincoln denies any remaining allegations of paragraph 245.

**ANSWER TO PARAGRAPH 246:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 246 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 247:** Paragraph 247 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 247 and thus denies them. To the extent paragraph 247 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 247 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 247.

**ANSWER TO PARAGRAPH 248:** To the extent paragraph 248 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 248 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 248.

**ANSWER TO PARAGRAPH 249:** Paragraph 249 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln

lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 249 and thus denies them. To the extent paragraph 249 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 249 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 249.

**ANSWER TO PARAGRAPH 250:** To the extent paragraph 250 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 250 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 250.

**ANSWER TO PARAGRAPH 251:** Paragraph 251 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 251. To the extent paragraph 251 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 251 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 251.

**ANSWER TO PARAGRAPH 252:** Paragraph 252 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 252 and thus denies them. To the extent paragraph 252 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 252 and, on that basis, denies them. Lincoln denies any remaining allegations in paragraph 252.

**ANSWER TO PARAGRAPH 253:** Paragraph 253 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 253 and thus denies them. To the extent paragraph 253 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 253 and, on that basis, denies them. Lincoln denies any remaining allegations in paragraph 253.

**ANSWER TO PARAGRAPH 254:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 254 and, on that basis, denies them.

**D. Defendants Collectively Monitor Compliance with the Scheme.**

**ANSWER TO PARAGRAPH 255:** To the extent paragraph 255 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 255 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 255.

**ANSWER TO PARAGRAPH 256:** Paragraph 256 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 256 and thus denies them. Lincoln denies any remaining allegations in paragraph 256.

**ANSWER TO PARAGRAPH 257:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 257 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 258:** To the extent paragraph 258 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 258 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 258.

**ANSWER TO PARAGRAPH 259:** Paragraph 259 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 259 and thus denies them. To the extent paragraph 259 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 259 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 259.

**ANSWER TO PARAGRAPH 260:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 260 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 261:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 261 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 262:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 262 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 263:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 263 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 264:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 264 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 265:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 265 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 266:** Lincoln denies the allegations of paragraph 266.

**ANSWER TO PARAGRAPH 267:** Lincoln denies the allegations of paragraph 267.

**ANSWER TO PARAGRAPH 268:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 268 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 269:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 269 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 270:** To the extent paragraph 270 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 270 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 270.

**ANSWER TO PARAGRAPH 271:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 271 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 272:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 272 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 273:** To the extent paragraph 273 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 273 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 273.

**ANSWER TO PARAGRAPH 274:** Paragraph 274 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 274. To the extent paragraph 274 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 274 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 275:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 275 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 276:** Paragraph 276 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln

lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 276 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 276 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 277:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 277 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 278:** Paragraph 278 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 278 and thus denies them. To the extent paragraph 278 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 278 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 278.

**ANSWER TO PARAGRAPH 279:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 279 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 280:** Paragraph 280 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 280. To the extent paragraph 280 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 280 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 280.

**ANSWER TO PARAGRAPH 281:** To the extent paragraph 281 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 281 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 281.

**ANSWER TO PARAGRAPH 282:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 282 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 283:** To the extent paragraph 283 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 283 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 283.

**ANSWER TO PARAGRAPH 284:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 284 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 285:** Paragraph 285 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 285 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 285 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 286:** To the extent paragraph 286 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 286 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 286.

**E. Property Owners and Managers Who Adopted RealPage's Pricing Recommendations Did So With the Common Goal of Raising Rent Prices Which Caused Inflated Rental Prices and Reduced Occupancy Levels in Their Respective Metro Areas.**

**ANSWER TO PARAGRAPH 287:** To the extent paragraph 287 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 287 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 287.

**ANSWER TO PARAGRAPH 288:** To the extent paragraph 288 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 288 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 288.

**ANSWER TO PARAGRAPH 289:** Paragraph 289 contains legal assertions, which do not require any response. To the extent a response is required and to the extent paragraph 289 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 289 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 289.

**ANSWER TO PARAGRAPH 290:** To the extent paragraph 290 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 290 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 290.

**ANSWER TO PARAGRAPH 291:** Paragraph 291 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 291 and thus denies them. To the extent paragraph 291 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 291 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 291.

**ANSWER TO PARAGRAPH 292:** Paragraph 292 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations

in paragraph 292 and thus denies them. To the extent paragraph 292 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 292 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 292.

**ANSWER TO PARAGRAPH 293:** To the extent paragraph 293 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 293 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 293.

**ANSWER TO PARAGRAPH 294:** Paragraph 294 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 294 and thus denies them.

**ANSWER TO PARAGRAPH 295:** Paragraph 295 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 295 and thus denies them.

**ANSWER TO PARAGRAPH 296:** Paragraph 296 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 296 and thus denies them.

**ANSWER TO PARAGRAPH 297:** Paragraph 297 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations

in paragraph 297 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 297 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 298:** Paragraph 298 purports to selectively quote from and characterize documents. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 298 and thus denies them. To the extent paragraph 298 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 298 and, on that basis, denies them. Lincoln denies the allegations in paragraph 298 specific to Lincoln. Lincoln denies any remaining allegations of paragraph 298.

**ANSWER TO PARAGRAPH 299:** Paragraph 299 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 299 and thus denies them. To the extent paragraph 299 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 299 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 299.

**ANSWER TO PARAGRAPH 300:** Paragraph 300 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 300 and thus denies them.

**ANSWER TO PARAGRAPH 301:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 301 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 302:** Paragraph 302 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 302 and thus denies them.

**ANSWER TO PARAGRAPH 303:** Paragraph 303 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 303. Paragraph 303 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 303 and thus denies them. To the extent paragraph 303 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 303 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 304:** Paragraph 304 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 304 and thus denies them. To the extent paragraph 304 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 304 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 304.

**ANSWER TO PARAGRAPH 305:** Paragraph 305 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 305 and thus denies them. To the extent paragraph 305 contains allegations that do not

pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 305 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 305.

**ANSWER TO PARAGRAPH 306:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 306 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 307:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 307 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 308:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 308 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 309:** Paragraph 309 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 309 and thus denies them.

**ANSWER TO PARAGRAPH 310:** Paragraph 310 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 310 and thus denies them.

**ANSWER TO PARAGRAPH 311:** To the extent paragraph 311 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 311 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 311.

**ANSWER TO PARAGRAPH 312:** To the extent paragraph 312 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 312 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 312.

**F. Property Owners and Managers Conspired Through Trade Associations to Standardize Lease Terms Unfavorable to Plaintiffs and Members of the Class.**

**ANSWER TO PARAGRAPH 313:** Paragraph 313 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 313. To the extent paragraph 313 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 313 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 314:** Paragraph 314 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 314 and thus denies them. Lincoln admits that Lincoln is a member of the Texas Apartment Association. To the extent paragraph 314 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 314 and, on that basis, denies them. Except as expressly admitted, Lincoln denies any remaining allegations of paragraph 314.

**ANSWER TO PARAGRAPH 315:** Paragraph 315 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 315 and thus denies them.

**ANSWER TO PARAGRAPH 316:** Paragraph 316 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 316 and thus denies them. To

the extent paragraph 316 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 316 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 316.

**ANSWER TO PARAGRAPH 317:** Paragraph 317 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 317 and thus denies them. To the extent paragraph 317 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 317 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 317.

**ANSWER TO PARAGRAPH 318:** Paragraph 318 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 318 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to any remaining allegations in paragraph 318 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 319:** Paragraph 319 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 319 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to any remaining allegations of paragraph 319 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 320:** Paragraph 320 purports to characterize a document which is not from Lincoln. The document speaks for itself, and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 320 and thus denies them.

Lincoln admits that Lincoln is a member of the National Apartment Association. To the extent paragraph 320 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 320 and, on that basis, denies them. Except as expressly admitted, Lincoln denies any remaining allegations of paragraph 320.

**ANSWER TO PARAGRAPH 321:** Paragraph 321 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 321 and thus denies them.

**ANSWER TO PARAGRAPH 322:** Paragraph 322 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 322 and thus denies them.

**ANSWER TO PARAGRAPH 323:** Paragraph 323 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 323 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to any remaining allegations in paragraph 323 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 324:** To the extent paragraph 324 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 324 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 324.

**ANSWER TO PARAGRAPH 325:** Paragraph 325 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or

information sufficient to determine the truth of any such allegations in paragraph 325 and thus denies them.

**ANSWER TO PARAGRAPH 326:** Paragraph 326 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 326 and thus denies them.

**ANSWER TO PARAGRAPH 327:** Paragraph 327 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 327 and thus denies them.

**ANSWER TO PARAGRAPH 328:** Paragraph 328 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 328 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 329:** Lincoln admits that Plaintiff Brandon Watters rented a unit at 2010 West End in Nashville, Tennessee for a lease term beginning on August 14, 2021. Lincoln further admits that Lincoln managed the property at that location for some period of time. Paragraph 329 purports to characterize Plaintiff Watters's lease, which speaks for itself. The remaining allegations in paragraph 329 contain legal assertions, which do not require any response. To the extent a response is required, except as expressly admitted, Lincoln denies any remaining allegations of paragraph 329.

**ANSWER TO PARAGRAPH 330:** Paragraph 330 purports to characterize Plaintiff Watters's lease, which speaks for itself. Lincoln denies any remaining allegations of paragraph 330.

**ANSWER TO PARAGRAPH 331:** To the extent paragraph 331 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 331 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 331.

**G. Preliminary Economic Analysis Confirms the Impact of RealPage's Revenue Management on Multifamily Rental Markets Nationwide.**

**ANSWER TO PARAGRAPH 332:** To the extent paragraph 332 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 332 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 332.

i. **Defendants' Increased Revenues Resulted from Proportionally Higher, Artificially Inflated Rent Increases.**

**ANSWER TO PARAGRAPH 333:** Paragraph 333 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 333 and thus denies them. To the extent paragraph 333 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 333 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 333.

**ANSWER TO PARAGRAPH 334:** Paragraph 334 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 334 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 334 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 335:** Paragraph 335 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 335 and thus denies them.

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 335 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 336:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 336 and, on that basis, denies them.

**ii. Owners, Owner-Operators, and Managing Defendants Engaged in Tacit Collusion to Artificially Increase Multifamily Rental Prices.**

**ANSWER TO PARAGRAPH 337:** Paragraph 337 purports to characterize a document. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 337 and thus denies them. To the extent paragraph 337 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 337 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 337.

**ANSWER TO PARAGRAPH 338:** Paragraph 338 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 338 and thus denies them. To the extent paragraph 338 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 338 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 338.

**ANSWER TO PARAGRAPH 339:** Lincoln denies that Plaintiffs have identified any cognizable Nashville market or submarket. As a result, Lincoln denies the allegations with respect to it. Paragraph 339 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 339 and thus denies them. To the extent paragraph 339 contains

allegations that do not pertain to Lincoln, Lincoln knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 339 and, on that basis, denies them. Lincoln denies any remaining allegations in paragraph 339.

**ANSWER TO PARAGRAPH 340:** Lincoln denies that Plaintiffs have identified any cognizable Atlanta market or submarket. As a result, Lincoln denies the allegations with respect to it. Paragraph 340 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 340 and thus denies them. To the extent paragraph 340 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 340 and, on that basis, denies them. Lincoln denies any remaining allegations in paragraph 340.

**ANSWER TO PARAGRAPH 341:** Lincoln denies that Plaintiffs have identified any cognizable Boston market or submarket. As a result, Lincoln denies the allegations with respect to it. Paragraph 341 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 341 and thus denies them. To the extent paragraph 341 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 341 and, on that basis, denies them. Lincoln denies any remaining allegations in paragraph 341.

**ANSWER TO PARAGRAPH 342:** Lincoln denies that Plaintiffs have identified any cognizable Dallas market or submarket. As a result, Lincoln denies the allegations with respect to it. Paragraph 342 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such

allegations in paragraph 342 and thus denies them. To the extent paragraph 342 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 342 and, on that basis, denies them. Lincoln denies any remaining allegations in paragraph 342.

**ANSWER TO PARAGRAPH 343:** Lincoln denies that Plaintiffs have identified any cognizable Denver market or submarket. As a result, Lincoln denies the allegations with respect to it. Paragraph 343 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 343 and thus denies them. To the extent paragraph 343 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 343 and, on that basis, denies them. Lincoln denies any remaining allegations in paragraph 343.

**ANSWER TO PARAGRAPH 344:** Lincoln denies that Plaintiffs have identified any cognizable District of Columbia market or submarket. Lincoln manages one property in Washington, D.C. Paragraph 344 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 344 and thus denies them. To the extent paragraph 344 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 344 and, on that basis, denies them. Lincoln denies any remaining allegations in paragraph 344.

**ANSWER TO PARAGRAPH 345:** Lincoln denies that Plaintiffs have identified any cognizable Miami market or submarket. As a result, Lincoln denies the allegations with respect to it. Paragraph 345 purports to characterize a document which is not from Lincoln. The document speaks for itself

and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 345 and thus denies them. To the extent paragraph 345 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 345 and, on that basis, denies them. Lincoln denies any remaining allegations in paragraph 345.

**ANSWER TO PARAGRAPH 346:** Lincoln denies that Plaintiffs have identified any cognizable Portland market or submarket. As a result, Lincoln denies the allegations with respect to it. Paragraph 346 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 346 and thus denies them. To the extent paragraph 346 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 346 and, on that basis, denies them. Lincoln denies any remaining allegations in paragraph 346.

**ANSWER TO PARAGRAPH 347:** Lincoln denies that Plaintiffs have identified any cognizable New York market or submarket. As a result, Lincoln denies the allegations with respect to it. Paragraph 347 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 347 and thus denies them. To the extent paragraph 347 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 347 and, on that basis, denies them. Lincoln denies any remaining allegations in paragraph 347.

**ANSWER TO PARAGRAPH 348:** Paragraph 348 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or

information sufficient to determine the truth of any such allegations in paragraph 348 and thus denies them. To the extent paragraph 348 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 348 and, on that basis, denies them. Lincoln denies any remaining allegations in paragraph 348.

**ANSWER TO PARAGRAPH 349:** Paragraph 349 contains legal assertions, which do not require any response. To the extent paragraph 349 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 349 and, on that basis, denies them. To the extent a response is required, Lincoln denies the allegations of paragraph 349.

**ANSWER TO PARAGRAPH 350:** To the extent paragraph 350 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 350 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 350.

**iii. Supply and Demand Factors Do Not Explain Inflated Rental Prices.**

**ANSWER TO PARAGRAPH 351:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 351 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 352:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 352 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 353:** Lincoln lacks the underlying data from which Figure 29 was created and therefore lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 353 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 354:** Paragraph 354 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or

information sufficient to determine the truth of any such allegations in paragraph 354 and thus denies them. To the extent paragraph 354 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 354 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 354.

**iv. Atlanta Submarket.**

**ANSWER TO PARAGRAPH 355:** Paragraph 355 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 355 and thus denies them. To the extent paragraph 355 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 355 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 355.

**ANSWER TO PARAGRAPH 356:** Paragraph 356 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 356 and thus denies them. To the extent paragraph 356 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 356 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 356.

**ANSWER TO PARAGRAPH 357:** Paragraph 357 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 357 and thus denies them. To the extent paragraph 357 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 357 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 357.

**ANSWER TO PARAGRAPH 358:** Paragraph 358 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 358 and thus denies them. To the extent paragraph 358 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 358 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 358.

**ANSWER TO PARAGRAPH 359:** Paragraph 359 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 359 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations of paragraph 359 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 360:** Paragraph 360 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 360 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations of paragraph 360 and, on that basis, denies them.

v.      **Orlando Submarket.**

**ANSWER TO PARAGRAPH 361:** Paragraph 361 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 361 and thus denies them. To the extent paragraph 361 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 361 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 361.

**vi. Phoenix Submarket.**

**ANSWER TO PARAGRAPH 362:** Paragraph 362 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 362 and thus denies them. To the extent paragraph 362 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 362 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 362.

**vii. Fort Worth (Dallas Submarket).**

**ANSWER TO PARAGRAPH 363:** Paragraph 363 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 363 and thus denies them. To the extent paragraph 363 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 363 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 363.

**ANSWER TO PARAGRAPH 364:** Paragraph 364 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 364 and thus denies them. To the extent paragraph 364 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 364 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 364.

**ANSWER TO PARAGRAPH 365:** To the extent paragraph 365 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to allegations in paragraph 365 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 365.

**H. “Plus Factors” in the Multifamily Rental Housing Market Provide Additional Evidence of a Price Fixing Conspiracy.**

**ANSWER TO PARAGRAPH 366:** Paragraph 366 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 366. Paragraph 366 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 366 and thus denies them.

**ANSWER TO PARAGRAPH 367:** Paragraph 367 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 367. To the extent paragraph 367 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 367 and, on that basis, denies them.

**i. The Multifamily Rental Market Is Highly Concentrated.**

**ANSWER TO PARAGRAPH 368:** Paragraph 368 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 368 and thus denies them. To the extent paragraph 368 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 368 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 368.

**ii. High Barriers to Entry.**

**ANSWER TO PARAGRAPH 369:** Lincoln denies the allegations of paragraph 369.

**ANSWER TO PARAGRAPH 370:** Lincoln denies the allegations of paragraph 370.

**ANSWER TO PARAGRAPH 371:** Lincoln denies the allegations of paragraph 371.

iii. **High Switching Costs for Renters.**

**ANSWER TO PARAGRAPH 372:** To the extent paragraph 372 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 372 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 372.

**ANSWER TO PARAGRAPH 373:** To the extent paragraph 373 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 373 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 373.

**ANSWER TO PARAGRAPH 374:** To the extent paragraph 374 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 374 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 374.

iv. **Inelasticity of Demand.**

**ANSWER TO PARAGRAPH 375:** To the extent paragraph 375 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 375 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 375.

**ANSWER TO PARAGRAPH 376:** To the extent paragraph 376 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 376 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 376.

v. **Multifamily Rental Housing Units Are a Fungible Product.**

**ANSWER TO PARAGRAPH 377:** Lincoln denies the allegations of paragraph 377.

**ANSWER TO PARAGRAPH 378:** Paragraph 378 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 378 and thus denies them. To the extent paragraph 378 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 378 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 378.

**ANSWER TO PARAGRAPH 379:** Paragraph 379 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 379 and thus denies them. To the extent paragraph 379 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 379 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 379.

**vi. Defendants Exchange Competitively Sensitive Information.**

**ANSWER TO PARAGRAPH 380:** Paragraph 380 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 380. Paragraph 380 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 380 and thus denies them. To the extent paragraph 380 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 380 and, on that basis, denies them.

vii. **Motive, Opportunities, and Invitations to Collude.**

**ANSWER TO PARAGRAPH 381:** Paragraph 381 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 381 and thus denies them. To the extent paragraph 381 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 381 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 381.

**ANSWER TO PARAGRAPH 382:** To the extent paragraph 382 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 382 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 382.

**ANSWER TO PARAGRAPH 383:** Paragraph 383 purports to selectively quote from and characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 383 and thus denies them. To the extent paragraph 383 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 383 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 383.

**ANSWER TO PARAGRAPH 384:** Paragraph 384 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 384 and thus denies them. To the extent paragraph 384 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations

in paragraph 384 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 384.

**ANSWER TO PARAGRAPH 385:** To the extent paragraph 385 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 385 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 385.

**ANSWER TO PARAGRAPH 386:** To the extent paragraph 386 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 386 and, on that basis, denies them. After a reasonable inquiry, Lincoln lacks knowledge or information sufficient to determine the truth of any remaining allegations in paragraph 386 and thus denies them.

**ANSWER TO PARAGRAPH 387:** Paragraph 387 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of such allegations in paragraph 387 and thus denies them. To the extent paragraph 387 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 387 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 387.

**ANSWER TO PARAGRAPH 388:** Paragraph 388 purports to selectively quote from and characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 388 and thus denies them. Lincoln admits it is a member of the National Apartment Association. To the extent paragraph 388 contains allegations that do not pertain to Lincoln,

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 388 and, on that basis, denies them. Except as expressly admitted, Lincoln denies any remaining allegations of paragraph 388.

**ANSWER TO PARAGRAPH 389:** To the extent paragraph 389 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 389 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 389.

**ANSWER TO PARAGRAPH 390:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 390 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 391:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 391 and, on that basis, denies them.

## **VI. RELEVANT MARKET**

**ANSWER TO PARAGRAPH 392:** Paragraph 392 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 392. To the extent paragraph 392 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 392 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 393:** Paragraph 393 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 393.

### **A. The Relevant Product Market Is Multifamily Residential Real Estate Leases.**

**ANSWER TO PARAGRAPH 394:** Lincoln denies the allegations of paragraph 394.

**ANSWER TO PARAGRAPH 395:** Lincoln denies the allegations of paragraph 395.

**ANSWER TO PARAGRAPH 396:** Lincoln denies the allegations of paragraph 396.

**ANSWER TO PARAGRAPH 397:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 397 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 398:** Paragraph 398 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 398. To the extent paragraph 398 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 398 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 399:** Paragraph 399 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 399. To the extent paragraph 399 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 399 and, on that basis, denies them.

**B. Defendants' Market Power in the Multifamily Residential Real Estate Market.**

**ANSWER TO PARAGRAPH 400:** Paragraph 400 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 400. To the extent paragraph 400 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 400 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 401:** Paragraph 401 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 401. To the extent paragraph 401 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 401 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 402:** To the extent paragraph 402 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 402 and, on that basis, denies them. Lincoln denies any remaining allegations in paragraph 402.

**ANSWER TO PARAGRAPH 403:** Paragraph 403 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 403. To the extent paragraph 403 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 403 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 404:** To the extent paragraph 404 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 404 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 404.

### C. Regional Submarkets

**ANSWER TO PARAGRAPH 405:** Paragraph 405 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 405. To the extent paragraph 405 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 405 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 406:** Paragraph 406 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 406 and thus denies them. To the extent paragraph 406 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations

in paragraph 406 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 406.

**ANSWER TO PARAGRAPH 407:** Paragraph 407 purports to characterize documents which are not from Lincoln. The documents speak for themselves and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 407 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 407 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 408:** Lincoln denies the allegations of paragraph 408.

**ANSWER TO PARAGRAPH 409:** Paragraph 409 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 409.

i.      **Nashville, Tennessee**

**ANSWER TO PARAGRAPH 410:** Paragraph 410 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 410 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 411:** Paragraph 411 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 411 and thus denies them.

**ANSWER TO PARAGRAPH 412:** To the extent paragraph 412 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 412 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 412.

**ANSWER TO PARAGRAPH 413:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. Lincoln admits that Lincoln managed 2010 West End at one time, but otherwise Lincoln denies the allegations in paragraph 413 due to Plaintiffs' insufficient allegations of a market or submarket. To the extent paragraph 413 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 413 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 414:** To the extent paragraph 414 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 414 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 414.

**ANSWER TO PARAGRAPH 415:** To the extent paragraph 415 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 415 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 415.

ii.      **Atlanta, Georgia**

**ANSWER TO PARAGRAPH 416:** Paragraph 416 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 416 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 417:** Paragraph 417 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 417 and thus denies them.

**ANSWER TO PARAGRAPH 418:** To the extent paragraph 418 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 418 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 418.

**ANSWER TO PARAGRAPH 419:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. Lincoln admits that Lincoln manages Seven Springs, but otherwise Lincoln denies the allegations in paragraph 419 due to Plaintiffs' insufficient allegations of a market or submarket. To the extent paragraph 419 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 419 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 420:** To the extent paragraph 420 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 420 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 420.

**ANSWER TO PARAGRAPH 421:** To the extent paragraph 421 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 421 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 421.

### iii. Austin, Texas

**ANSWER TO PARAGRAPH 422:** Paragraph 422 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 422 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 423:** Paragraph 423 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 423 and thus denies them.

**ANSWER TO PARAGRAPH 424:** To the extent paragraph 424 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 424 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 424.

**ANSWER TO PARAGRAPH 425:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 425 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 425 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 426:** To the extent paragraph 426 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 426 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 426.

**ANSWER TO PARAGRAPH 427:** To the extent paragraph 427 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 427 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 427.

iv.      **Baltimore, Maryland**

**ANSWER TO PARAGRAPH 428:** Paragraph 428 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to

form a belief as to the truth of any remaining allegations in paragraph 428 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 429:** Paragraph 429 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 429 and thus denies them.

**ANSWER TO PARAGRAPH 430:** To the extent paragraph 430 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 430 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 430.

**ANSWER TO PARAGRAPH 431:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 431 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 431 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 432:** To the extent paragraph 432 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 432 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 432.

**ANSWER TO PARAGRAPH 433:** To the extent paragraph 433 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 433 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 433.

**ANSWER TO PARAGRAPH 434:** To the extent paragraph 434 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 434 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 434.

v.      **Boston, Massachusetts**

**ANSWER TO PARAGRAPH 435:** Paragraph 435 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 435 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 436:** Paragraph 436 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 436 and thus denies them.

**ANSWER TO PARAGRAPH 437:** To the extent paragraph 437 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 437 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 437.

**ANSWER TO PARAGRAPH 438:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 438 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 438 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 439:** To the extent paragraph 439 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 439 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 439.

**ANSWER TO PARAGRAPH 440:** To the extent paragraph 440 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 440 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 440.

**ANSWER TO PARAGRAPH 441:** To the extent paragraph 441 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 441 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 441.

vi. **Charlotte, North Carolina**

**ANSWER TO PARAGRAPH 442:** Paragraph 442 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 442 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 443:** Paragraph 443 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 443 and thus denies them.

**ANSWER TO PARAGRAPH 444:** To the extent paragraph 444 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 444 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 444.

**ANSWER TO PARAGRAPH 445:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 445 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 445 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 446:** To the extent paragraph 446 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 446 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 446.

**ANSWER TO PARAGRAPH 447:** To the extent paragraph 447 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 447 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 447.

vii. **Chicago, Illinois**

**ANSWER TO PARAGRAPH 448:** Paragraph 448 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 448 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 449:** Paragraph 449 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 449 and thus denies them.

**ANSWER TO PARAGRAPH 450:** To the extent paragraph 450 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 450 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 450.

**ANSWER TO PARAGRAPH 451:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 451 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 451 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 452:** To the extent paragraph 452 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 452 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 452.

**ANSWER TO PARAGRAPH 453:** To the extent paragraph 453 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 453 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 453.

#### viii. Dallas, Texas

**ANSWER TO PARAGRAPH 454:** Paragraph 454 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 454 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 455:** Paragraph 455 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 455 and thus denies them.

**ANSWER TO PARAGRAPH 456:** To the extent paragraph 456 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 456 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 456.

**ANSWER TO PARAGRAPH 457:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 457 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 457 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 458:** To the extent paragraph 458 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 458 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 458.

**ANSWER TO PARAGRAPH 459:** To the extent paragraph 459 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 459 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 459.

#### **ix.      Denver, Colorado**

**ANSWER TO PARAGRAPH 460:** Paragraph 460 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 460 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 461:** Paragraph 461 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 461 and thus denies them.

**ANSWER TO PARAGRAPH 462:** To the extent paragraph 462 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 462 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 462.

**ANSWER TO PARAGRAPH 463:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 463 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 463 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 464:** To the extent paragraph 464 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 464 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 464.

**ANSWER TO PARAGRAPH 465:** To the extent paragraph 465 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 465 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 465.

**ANSWER TO PARAGRAPH 466:** To the extent paragraph 466 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 466 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 466.

x.      **Detroit, Michigan**

**ANSWER TO PARAGRAPH 467:** Paragraph 467 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 467 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 468:** Paragraph 468 purports to a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 468 and thus denies them.

**ANSWER TO PARAGRAPH 469:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 469 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 470:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 470 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 470 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 471:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 471 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 472:** To the extent paragraph 472 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 472 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 472.

**xi. Houston, Texas**

**ANSWER TO PARAGRAPH 473:** Paragraph 473 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 473 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 474:** Paragraph 474 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 474 and thus denies them.

**ANSWER TO PARAGRAPH 475:** To the extent paragraph 475 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 475 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 475.

**ANSWER TO PARAGRAPH 476:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 476 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 476 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 477:** To the extent paragraph 477 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 477 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 477.

**ANSWER TO PARAGRAPH 478:** To the extent paragraph 478 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 478 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 478.

xii. **Jacksonville, Florida**

**ANSWER TO PARAGRAPH 479:** Paragraph 479 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 479 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 480:** Paragraph 480 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 480 and thus denies them.

**ANSWER TO PARAGRAPH 481:** To the extent paragraph 481 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 481 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 481.

**ANSWER TO PARAGRAPH 482:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 482 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 482 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 483:** To the extent paragraph 483 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 483 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 483.

**ANSWER TO PARAGRAPH 484:** To the extent paragraph 484 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 484 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 484.

**xiii. Las Vegas, Nevada**

**ANSWER TO PARAGRAPH 485:** Paragraph 485 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 485 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 486:** Paragraph 486 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 486 and thus denies them.

**ANSWER TO PARAGRAPH 487:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 487 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 488:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 488 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 488 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 489:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 489 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 490:** To the extent paragraph 490 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 490 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 490.

**xiv. Los Angeles, California**

**ANSWER TO PARAGRAPH 491:** Paragraph 491 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 491 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 492:** Paragraph 492 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 492 and thus denies them.

**ANSWER TO PARAGRAPH 493:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 493 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 494:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 494 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 494 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 495:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 495 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 496:** To the extent paragraph 496 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 496 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 496.

**ANSWER TO PARAGRAPH 497:** To the extent paragraph 497 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 497 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 497.

**xv.      Memphis, Tennessee**

**ANSWER TO PARAGRAPH 498:** Paragraph 498 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 498 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 499:** Paragraph 499 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 499 and thus denies them.

**ANSWER TO PARAGRAPH 500:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 500 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 501:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 501 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 501 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 502:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 502 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 503:** To the extent paragraph 503 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 503 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 503.

**xvi. Miami, Florida**

**ANSWER TO PARAGRAPH 504:** Paragraph 504 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 504 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 505:** Paragraph 505 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 505 and thus denies them.

**ANSWER TO PARAGRAPH 506:** To the extent paragraph 506 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 506 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 506.

**ANSWER TO PARAGRAPH 507:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 507 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 507 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 508:** To the extent paragraph 508 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 508 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 508.

**ANSWER TO PARAGRAPH 509:** To the extent paragraph 509 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 509 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 509.

**xvii. Milwaukee, Wisconsin**

**ANSWER TO PARAGRAPH 510:** Paragraph 510 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 510 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 511:** Paragraph 511 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 511 and thus denies them.

**ANSWER TO PARAGRAPH 512:** To the extent paragraph 512 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 512 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 512.

**ANSWER TO PARAGRAPH 513:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 513 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 513 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 514:** To the extent paragraph 514 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 514 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 514.

**ANSWER TO PARAGRAPH 515:** To the extent paragraph 515 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 515 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 515.

**xviii. Minneapolis, Minnesota**

**ANSWER TO PARAGRAPH 516:** Paragraph 516 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 516 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 517:** Paragraph 517 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 517 and thus denies them.

**ANSWER TO PARAGRAPH 518:** To the extent paragraph 518 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 518 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 518.

**ANSWER TO PARAGRAPH 519:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 519 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 519 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 520:** To the extent paragraph 520 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 520 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 520.

**ANSWER TO PARAGRAPH 521:** To the extent paragraph 521 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 521 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 521.

#### **xix. New York, New York**

**ANSWER TO PARAGRAPH 522:** Paragraph 522 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 522 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 523:** Paragraph 523 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 523 and thus denies them.

**ANSWER TO PARAGRAPH 524:** To the extent paragraph 524 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 524 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 524.

**ANSWER TO PARAGRAPH 525:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 525 contains allegations that do not pertain to Lincoln,

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 525 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 526:** To the extent paragraph 526 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 526 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 526.

**ANSWER TO PARAGRAPH 527:** To the extent paragraph 527 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 527 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 527.

**ANSWER TO PARAGRAPH 528:** To the extent paragraph 528 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 528 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 528.

**xx. Orlando, Florida**

**ANSWER TO PARAGRAPH 529:** Paragraph 529 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 529 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 530:** Paragraph 530 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 530 and thus denies them.

**ANSWER TO PARAGRAPH 531:** To the extent paragraph 531 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 531 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 531.

**ANSWER TO PARAGRAPH 532:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 532 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 532 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 533:** To the extent paragraph 533 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 533 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 533.

**ANSWER TO PARAGRAPH 534:** To the extent paragraph 534 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 534 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 534.

**xxi. Philadelphia, Pennsylvania**

**ANSWER TO PARAGRAPH 535:** Paragraph 535 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 535 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 536:** Paragraph 536 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 536 and thus denies them.

**ANSWER TO PARAGRAPH 537:** To the extent paragraph 537 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 537 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 537.

**ANSWER TO PARAGRAPH 538:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 538 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 538 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 539:** To the extent paragraph 539 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 539 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 539.

#### **xxii. Phoenix, Arizona**

**ANSWER TO PARAGRAPH 540:** Paragraph 540 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 540 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 541:** Paragraph 541 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 541 and thus denies them.

**ANSWER TO PARAGRAPH 542:** To the extent paragraph 542 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 542 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 542.

**ANSWER TO PARAGRAPH 543:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 543 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 543 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 544:** To the extent paragraph 544 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 544 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 544.

**ANSWER TO PARAGRAPH 545:** To the extent paragraph 545 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 545 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 545.

**ANSWER TO PARAGRAPH 546:** To the extent paragraph 546 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 546 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 546.

**xxiii. Pittsburgh, Pennsylvania**

**ANSWER TO PARAGRAPH 547:** Paragraph 547 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 547 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 548:** Paragraph 548 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 548 and thus denies them.

**ANSWER TO PARAGRAPH 549:** To the extent paragraph 549 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 549 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 549.

**ANSWER TO PARAGRAPH 550:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 550 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 550 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 551:** To the extent paragraph 551 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 551 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 551.

**ANSWER TO PARAGRAPH 552:** To the extent paragraph 552 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 552 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 552.

**xxiv. Portland, Oregon**

**ANSWER TO PARAGRAPH 553:** Paragraph 553 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 553 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 554:** Paragraph 554 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 554 and thus denies them.

**ANSWER TO PARAGRAPH 555:** To the extent paragraph 555 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 555 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 555.

**ANSWER TO PARAGRAPH 556:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 556 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 556 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 557:** To the extent paragraph 557 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 557 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 557.

**ANSWER TO PARAGRAPH 558:** To the extent paragraph 558 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 558 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 558.

**ANSWER TO PARAGRAPH 559:** To the extent paragraph 559 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 559 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 559.

**xxv. San Diego, California**

**ANSWER TO PARAGRAPH 560:** Paragraph 560 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 560 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 561:** Paragraph 561 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 561 and thus denies them.

**ANSWER TO PARAGRAPH 562:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 562 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 563:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 563 contains allegations that

do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 563 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 564:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 564 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 565:** To the extent paragraph 565 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 565 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 565.

**ANSWER TO PARAGRAPH 566:** To the extent paragraph 566 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 566 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 566.

#### **xxvi. San Francisco, California**

**ANSWER TO PARAGRAPH 567:** Paragraph 567 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 567 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 568:** Paragraph 568 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 568 and thus denies them.

**ANSWER TO PARAGRAPH 569:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 569 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 570:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 570 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 570 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 571:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 571 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 572:** To the extent paragraph 572 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 572 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 572.

**ANSWER TO PARAGRAPH 573:** To the extent paragraph 573 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 573 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 573.

#### **xxvii. San Jose, California**

**ANSWER TO PARAGRAPH 574:** Paragraph 574 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 574 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 575:** Paragraph 575 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 575 and thus denies them.

**ANSWER TO PARAGRAPH 576:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 576 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 577:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 577 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 577 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 578:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 578 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 579:** To the extent paragraph 579 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 579 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 579.

**ANSWER TO PARAGRAPH 580:** To the extent paragraph 580 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 580 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 580.

### **xxviii. Seattle, Washington**

**ANSWER TO PARAGRAPH 581:** Paragraph 581 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to

form a belief as to the truth of any remaining allegations in paragraph 581 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 582:** Paragraph 582 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 582 and thus denies them.

**ANSWER TO PARAGRAPH 583:** To the extent paragraph 583 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 583 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 583.

**ANSWER TO PARAGRAPH 584:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 584 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 584 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 585:** To the extent paragraph 585 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 585 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 585.

**ANSWER TO PARAGRAPH 586:** To the extent paragraph 586 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 586 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 586.

**ANSWER TO PARAGRAPH 587:** To the extent paragraph 587 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 587 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 587.

**xxix. St. Louis, Missouri**

**ANSWER TO PARAGRAPH 588:** Paragraph 588 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 588 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 589:** Paragraph 589 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 589 and thus denies them.

**ANSWER TO PARAGRAPH 590:** To the extent paragraph 590 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 590 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 590.

**ANSWER TO PARAGRAPH 591:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 591 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 591 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 592:** To the extent paragraph 592 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 592 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 592.

**ANSWER TO PARAGRAPH 593:** To the extent paragraph 593 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 593 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 593.

**xxx. Tampa, Florida**

**ANSWER TO PARAGRAPH 594:** Paragraph 594 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 594 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 595:** Paragraph 595 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 595 and thus denies them.

**ANSWER TO PARAGRAPH 596:** To the extent paragraph 596 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 596 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 596.

**ANSWER TO PARAGRAPH 597:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 597 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 597 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 598:** To the extent paragraph 598 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 598 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 598.

**ANSWER TO PARAGRAPH 599:** To the extent paragraph 599 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 599 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 599.

**xxxii. Tucson, Arizona**

**ANSWER TO PARAGRAPH 600:** Paragraph 600 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 600 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 601:** Paragraph 601 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 601 and thus denies them.

**ANSWER TO PARAGRAPH 602:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 602 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 603:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 603 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 603 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 604:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 604 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 605:** To the extent paragraph 605 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 605 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 605.

### **xxxii. Washington, District of Columbia**

**ANSWER TO PARAGRAPH 606:** Paragraph 606 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 606 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 607:** Paragraph 607 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 607 and thus denies them.

**ANSWER TO PARAGRAPH 608:** To the extent paragraph 608 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 608 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 608.

**ANSWER TO PARAGRAPH 609:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 609 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 609 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 610:** To the extent paragraph 610 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 610 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 610.

**ANSWER TO PARAGRAPH 611:** To the extent paragraph 611 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 611 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 611.

**ANSWER TO PARAGRAPH 612:** To the extent paragraph 612 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 612 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 612.

### **xxxiii. Wilmington, North Carolina**

**ANSWER TO PARAGRAPH 613:** Paragraph 613 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 613 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 614:** Paragraph 614 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any allegation in paragraph 614 and thus denies them.

**ANSWER TO PARAGRAPH 615:** To the extent paragraph 615 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the

truth of the allegations in paragraph 615 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 615.

**ANSWER TO PARAGRAPH 616:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 616 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 616 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 617:** To the extent paragraph 617 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 617 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 617.

**ANSWER TO PARAGRAPH 618:** To the extent paragraph 618 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 618 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 618.

**ANSWER TO PARAGRAPH 619:** To the extent paragraph 619 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 619 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 619.

**xxxiv. Birmingham-Hoover, AL MSA**

**ANSWER TO PARAGRAPH 620:** Paragraph 620 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Paragraph 620 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information

sufficient to determine the truth of any such allegations in paragraph 620 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 620 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 621:** Paragraph 621 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 621 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 622:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 622 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 622 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 623:** To the extent paragraph 623 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 623 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 623.

**ANSWER TO PARAGRAPH 624:** To the extent paragraph 624 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 624 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 624.

#### **xxxv. Buffalo, New York**

**ANSWER TO PARAGRAPH 625:** Paragraph 625 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Paragraph 625 purports to characterize a document which

is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 625 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 625 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 626:** Paragraph 626 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 626 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 627:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 627 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 627 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 628:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 628 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 629:** To the extent paragraph 629 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 629 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 629.

#### **xxxvi. Cincinnati, Ohio**

**ANSWER TO PARAGRAPH 630:** Paragraph 630 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Paragraph 630 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 630 and thus denies them.

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 630 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 631:** Paragraph 631 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 631 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 632:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 632 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 632 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 633:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 633 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 634:** To the extent paragraph 634 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 634 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 634.

#### **xxxvii. Cleveland, Ohio**

**ANSWER TO PARAGRAPH 635:** Paragraph 635 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Paragraph 635 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 635 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 635 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 636:** Paragraph 636 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 636 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 637:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 637 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 637 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 638:** To the extent paragraph 638 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 638 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 638.

**ANSWER TO PARAGRAPH 639:** To the extent paragraph 639 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 639 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 639.

**xxxviii. Columbus, Ohio**

**ANSWER TO PARAGRAPH 640:** Paragraph 640 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Paragraph 640 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 640 and thus denies them.

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 640 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 641:** Paragraph 641 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 641 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 642:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 642 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 642 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 643:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 643 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 644:** To the extent paragraph 644 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 644 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 644.

#### **xxxix. Hartford, Connecticut**

**ANSWER TO PARAGRAPH 645:** Paragraph 645 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Paragraph 645 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 645 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 645 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 646:** Paragraph 646 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 646 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 647:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 647 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 647 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 648:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 648 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 649:** To the extent paragraph 649 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 649 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 649.

**xl.      Riverside, California**

**ANSWER TO PARAGRAPH 650:** Paragraph 650 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Paragraph 650 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 650 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 650 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 651:** Paragraph 651 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln lacks knowledge or information

sufficient to form a belief as to the truth of the allegations in paragraph 651 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 652:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 652 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 652 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 653:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 653 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 654:** To the extent paragraph 654 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 654 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 654.

**xli. Sacramento, California**

**ANSWER TO PARAGRAPH 655:** Paragraph 655 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Paragraph 655 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 655 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 655 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 656:** Paragraph 656 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 656 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 657:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 657 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 657 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 658:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 658 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 659:** To the extent paragraph 659 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 659 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 659.

**xlii. Salt Lake City, Utah**

**ANSWER TO PARAGRAPH 660:** Paragraph 660 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Paragraph 660 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 660 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 660 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 661:** Paragraph 661 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 661 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 662:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 662 contains allegations that

do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 662 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 663:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 663 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 664:** To the extent paragraph 664 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 664 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 664.

**xliii. San Antonio, Texas**

**ANSWER TO PARAGRAPH 665:** Paragraph 665 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Paragraph 665 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 665 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 665 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 666:** Paragraph 666 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 666 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 667:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. As a result, Lincoln denies the allegations with respect to it. To the extent paragraph 667 contains allegations that do not pertain to Lincoln,

Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 667 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 668:** To the extent paragraph 668 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 668 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 668.

**ANSWER TO PARAGRAPH 669:** To the extent paragraph 669 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 669 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 669.

**xliv. San Juan, Puerto Rico**

**ANSWER TO PARAGRAPH 670:** Paragraph 670 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Paragraph 670 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 670 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 670 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 671:** Paragraph 671 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 671 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 672:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 672 and, on that basis, denies them.

**xlv. Virginia Beach, Virginia**

**ANSWER TO PARAGRAPH 673:** Paragraph 673 purports to characterize the Census Bureau MSA definition, which speaks for itself. Lincoln specifically denies that Plaintiffs sufficiently allege a cognizable market or submarket. Paragraph 673 purports to characterize a document which is not from Lincoln. The document speaks for itself and Lincoln lacks knowledge or information sufficient to determine the truth of any such allegations in paragraph 673 and thus denies them. Lincoln lacks knowledge or information sufficient to form a belief as to the truth of any remaining allegations in paragraph 673 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 674:** Paragraph 674 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 674 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 675:** Lincoln denies that Plaintiffs have sufficiently alleged a cognizable geographic market or submarket. To the extent paragraph 675 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 675 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 676:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 676 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 677:** To the extent paragraph 677 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 677 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 677.

**ANSWER TO PARAGRAPH 678:** Lincoln denies the allegations of paragraph 678.

**ANSWER TO PARAGRAPH 679:** To the extent paragraph 679 contains allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 679 and, on that basis, denies them. Lincoln denies any remaining allegations of paragraph 679.

**ANSWER TO PARAGRAPH 680:** Paragraph 680 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations of paragraph 680. To the extent paragraph 680 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 680 and, on that basis, denies them.

## **VII. CLASS ACTION ALLEGATIONS**

**ANSWER TO PARAGRAPH 681:** Lincoln denies that any class may be certified in this action, denies that Plaintiffs are entitled to any relief, and denies any remaining allegations of paragraph 681.

**ANSWER TO PARAGRAPH 682:** Lincoln denies that any class may be certified in this action, denies that Plaintiffs are entitled to any relief, and denies any remaining allegations of paragraph 682.

**ANSWER TO PARAGRAPH 683:** Paragraph 683 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 683.

**ANSWER TO PARAGRAPH 684:** Paragraph 684 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 684. To the extent paragraph 684 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 684 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 685:** Paragraph 685 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 685.

**ANSWER TO PARAGRAPH 686:** Paragraph 686 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 686.

**ANSWER TO PARAGRAPH 687:** Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 687 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 688:** Paragraph 688 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 688.

**ANSWER TO PARAGRAPH 689:** Paragraph 689 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 689.

**ANSWER TO PARAGRAPH 690:** Paragraph 690 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 690.

## **VIII. ANTITRUST INJURY**

**ANSWER TO PARAGRAPH 691:** Paragraph 691 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 691.

**ANSWER TO PARAGRAPH 692:** Paragraph 692 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 692.

**ANSWER TO PARAGRAPH 693:** Paragraph 693 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 693.

## **IX. CONTINUING VIOLATION**

**ANSWER TO PARAGRAPH 694:** Paragraph 694 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 694. To the extent paragraph 694 contains factual allegations that do not pertain to Lincoln, Lincoln lacks knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 694 and, on that basis, denies them.

**ANSWER TO PARAGRAPH 695:** Lincoln denies the allegations in paragraph 695.

**ANSWER TO PARAGRAPH 696:** Paragraph 696 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 696.

**ANSWER TO PARAGRAPH 697:** Paragraph 697 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 697.

**ANSWER TO PARAGRAPH 698:** Paragraph 698 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 698.

**ANSWER TO PARAGRAPH 699:** Paragraph 699 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 699.

**ANSWER TO PARAGRAPH 700:** Paragraph 700 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 700.

## **X. CLAIMS FOR RELIEF**

### **COUNT I** **Price Fixing in Violation of** **Section 1 of the Sherman Act (15 U.S.C. § 1)**

**ANSWER TO PARAGRAPH 701:** Paragraph 701 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln denies the allegations of paragraph 701. Lincoln incorporates by reference its answers to each preceding and succeeding paragraph, as if fully set forth herein in response to paragraph 701.

**ANSWER TO PARAGRAPH 702:** Paragraph 702 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 702.

**ANSWER TO PARAGRAPH 703:** Paragraph 703 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 703.

**ANSWER TO PARAGRAPH 704:** Paragraph 704 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 704.

**ANSWER TO PARAGRAPH 705:** Paragraph 705 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 705.

**ANSWER TO PARAGRAPH 706:** Paragraph 706 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 706.

**ANSWER TO PARAGRAPH 707:** Lincoln denies the allegations in paragraph 707.

**COUNT II**  
**Violation of State Antitrust Statutes**  
**(On behalf of Plaintiffs and the Class)**

**ANSWER TO PARAGRAPH 708:** Paragraph 708 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln denies the allegations of paragraph 708. Lincoln incorporates by reference its answers to each preceding and succeeding paragraph, as if fully set forth herein in response to paragraph 708.

**ANSWER TO PARAGRAPH 709:** Paragraph 709 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 709.

**ANSWER TO PARAGRAPH 710:** Paragraph 710 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 710.

**ANSWER TO PARAGRAPH 711:** Paragraph 711 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 711.

**ANSWER TO PARAGRAPH 712:** Paragraph 712 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 712.

**ANSWER TO PARAGRAPH 713:** Paragraph 713 contains no factual allegations to which a response is required. To the extent a response is required, Lincoln denies that Plaintiffs are entitled to any damages or other relief whatsoever.

**ANSWER TO PARAGRAPH 714:** Paragraph 714 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 714.

**ANSWER TO PARAGRAPH 715:** Paragraph 715 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 715.

**ANSWER TO PARAGRAPH 716:** Paragraph 716 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 716.

**ANSWER TO PARAGRAPH 717:** Paragraph 717 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 717.

**ANSWER TO PARAGRAPH 718:** Paragraph 718 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 718.

**ANSWER TO PARAGRAPH 719:** Paragraph 719 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 719.

**ANSWER TO PARAGRAPH 720:** Paragraph 720 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 720.

**ANSWER TO PARAGRAPH 721:** Paragraph 721 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 721.

**ANSWER TO PARAGRAPH 722:** Paragraph 722 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 722.

**ANSWER TO PARAGRAPH 723:** Paragraph 723 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 723.

**ANSWER TO PARAGRAPH 724:** Paragraph 724 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 724.

**ANSWER TO PARAGRAPH 725:** Paragraph 725 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 725.

**ANSWER TO PARAGRAPH 726:** Paragraph 726 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 726.

**ANSWER TO PARAGRAPH 727:** Paragraph 727 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 727.

**ANSWER TO PARAGRAPH 728:** Paragraph 728 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 728.

**ANSWER TO PARAGRAPH 729:** Paragraph 729 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 729.

**ANSWER TO PARAGRAPH 730:** Paragraph 730 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 730.

**ANSWER TO PARAGRAPH 731:** Paragraph 731 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 731.

**ANSWER TO PARAGRAPH 732:** Paragraph 732 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 732.

**ANSWER TO PARAGRAPH 733:** Paragraph 733 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 733.

**ANSWER TO PARAGRAPH 734:** Paragraph 734 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 734.

**ANSWER TO PARAGRAPH 735:** Paragraph 735 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 735.

**ANSWER TO PARAGRAPH 736:** Paragraph 736 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 736.

**ANSWER TO PARAGRAPH 737:** Paragraph 737 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 737.

**ANSWER TO PARAGRAPH 738:** Paragraph 738 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 738.

**ANSWER TO PARAGRAPH 739:** Paragraph 739 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 739.

**ANSWER TO PARAGRAPH 740:** Paragraph 740 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 740.

**ANSWER TO PARAGRAPH 741:** Paragraph 741 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 741.

**ANSWER TO PARAGRAPH 742:** Paragraph 742 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 742.

**ANSWER TO PARAGRAPH 743:** Paragraph 743 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 743.

**ANSWER TO PARAGRAPH 744:** Paragraph 744 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 744.

**ANSWER TO PARAGRAPH 745:** Paragraph 745 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 745.

**ANSWER TO PARAGRAPH 746:** Paragraph 746 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 746.

**ANSWER TO PARAGRAPH 747:** Paragraph 747 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 747.

**ANSWER TO PARAGRAPH 748:** Paragraph 748 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 748.

**ANSWER TO PARAGRAPH 749:** Paragraph 749 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 749.

**ANSWER TO PARAGRAPH 750:** Paragraph 750 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 750.

**ANSWER TO PARAGRAPH 751:** Paragraph 751 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 751.

**ANSWER TO PARAGRAPH 752:** Paragraph 752 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 752.

**ANSWER TO PARAGRAPH 753:** Paragraph 753 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 753.

**ANSWER TO PARAGRAPH 754:** Paragraph 754 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 754.

**ANSWER TO PARAGRAPH 755:** Paragraph 755 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 755.

**ANSWER TO PARAGRAPH 756:** Paragraph 756 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 756.

**ANSWER TO PARAGRAPH 757:** Paragraph 757 contains legal assertions, which do not require any response. To the extent a response is required, Lincoln denies the allegations in paragraph 757.

## **XI. PRAYER FOR RELIEF**

**ANSWER TO PRAYER FOR RELIEF:** Lincoln denies any and all allegations contained in Plaintiffs' prayer for relief, denies that Plaintiffs are entitled to any relief, and requests that Plaintiffs take nothing in this suit and that this matter be dismissed with prejudice, with costs and fees awarded to Lincoln.

## **JURY TRIAL DEMANDED**

**ANSWER TO JURY TRIAL DEMAND:** Plaintiffs' Jury Trial Demand contains no factual assertions to which a response is required. Plaintiffs' Jury Trial Demand further states legal assertions and Plaintiffs' characterizations of this action, with which Lincoln disagrees and to which no response is required. To the extent a response is required, Lincoln states that certain named Plaintiffs and unnamed putative class members have agreed to valid and enforceable jury waivers, arbitration agreements, and class action waivers, which Lincoln intends to enforce. Lincoln further denies that Plaintiffs have stated claims that are triable. Lincoln denies any remaining allegations of Plaintiffs' Jury Trial Demand.

## **AFFIRMATIVE DEFENSES**

Without assuming any burden that it would not otherwise bear, Lincoln asserts the following avoidances and defenses to Plaintiffs' and putative unnamed class members' claims. Lincoln incorporates by reference the admissions, allegations, and denials contained in its Answer, and reserves the right to amend this Answer and to assert other defenses as this action proceeds.

Federal Rule of Civil Procedure 8 sets forth the avoidances and defenses that must be affirmatively stated in a pleading. *See Fed. R. Civ. P. 8(c)* ("In responding to a pleading, a party must affirmatively state any avoidance or affirmative defense[.]").

To the extent necessary, Lincoln alleges Plaintiffs' claims are barred because the acts Plaintiffs allege Lincoln undertook in furtherance of the alleged conspiracy were in Lincoln's unilateral business interest. Lincoln reserves the right to assert additional avoidances and defenses as they become known during discovery and based on the record as it develops, up to and including the time of trial.

1. Plaintiffs' claims are barred, in whole or in part, by the applicable state and federal statute of limitations.
2. To the extent Plaintiffs seek to bring claims outside the applicable statute of limitations, Plaintiffs' Complaint is time-barred.
3. To the extent that Plaintiffs' Complaint relies on information made public more than four years ago, Plaintiff's Complaint is time-barred.
4. Plaintiffs' claims are barred, in whole or in part, because Plaintiffs failed to exercise reasonable care to mitigate any damages they may have suffered.
5. To the extent Plaintiffs believed Defendants agreed to use RealPage Revenue Management software and that such agreement had the effect of raising rental prices above

competitive levels, Plaintiffs had an obligation to mitigate their damages by seeking other sources of supply, including from other property managers or owners. Plaintiffs' failure to exercise reasonable care to mitigate damages was the complete or partial cause of any damages Plaintiffs may have suffered.

10. Plaintiffs' claims are barred, in whole or in part, because any alleged injuries and damages either were not legally or proximately caused by any acts or omissions of Lincoln or were caused, if at all, solely and proximately by Plaintiffs' conduct or by the conduct of third parties including, without limitation, the prior, intervening, or superseding conduct of Plaintiffs or third parties.

11. Plaintiffs' claims are barred, in whole or in part, by the doctrine of waiver.

12. Plaintiffs' continued rental leases at what they now allege are prices above the competitive level manifest an intention to waive any right to bring this suit and are inconsistent with any other intention.

13. Plaintiffs, by their actions, accepted the benefits of an ongoing relationship with Defendants and relinquished their rights to bring suit.

14. Plaintiffs' claims are barred by the equitable doctrine of laches.

15. Plaintiffs demonstrated an unreasonable lack of diligence in bringing their claims.

16. Plaintiffs' unreasonable lack of diligence in bringing their claims now bars them.

17. Plaintiffs' claims are barred, in whole or in part, due to their ratification of, and consent to, the conduct of Lincoln.

18. Plaintiffs' Complaint demonstrates its long-standing ratification of and consent to the complained-of conduct.

19. Accordingly, because Plaintiffs have been aware for years of the very same conduct they now challenge—and because some of that conduct provided Plaintiffs a direct benefit—Plaintiffs' claims are barred by the doctrine of ratification.

20. Plaintiffs' claims are barred, in whole or in part, to the extent Plaintiffs seeks to impose liability on Lincoln based on the exercise of any person or entity's right to petition federal, state, and local governmental bodies, including through public statements, because such conduct was immune under the *Noerr-Pennington* doctrine and privileged under the First Amendment to the U.S. Constitution.

21. Plaintiffs' claims are barred, in whole or in part, to the extent Plaintiffs and putative class members entered into a contract that requires arbitration of the claims at issue, requires suit in a different forum, precludes a jury trial, or precludes a class or other representative proceeding.

22. Without admitting the existence of any contract, combination, or conspiracy in restraint of trade, and expressly denying same, Plaintiffs' claims are barred, in whole or in part, by non-settling Defendants' right to set off any amounts paid to Plaintiffs by any Defendants who have settled, or do settle, Plaintiffs' claims against them in this action.

23. Upon information and belief, Plaintiffs' claims are barred, in whole or in part, by Defendants' right to set off any amount paid to Plaintiffs by damages attributable to Plaintiffs' conduct to the extent Plaintiffs unlawfully shared information found to be competitively sensitive regarding their rental lease agreements or potential alternative rental lease agreements.

24. Plaintiffs' claims are barred, in whole or in part, to the extent they seek improper multiple damage awards, and damage awards duplicative of those sought in other actions, in violation of the Due Process guarantees of the Fifth and Fourteenth Amendments of the United States Constitution and of the Eighth Amendment of the United States Constitution.

25. Plaintiffs' claims are barred, in whole or in part, by the Plaintiffs' knowing acquiescence to the restraints of trade alleged in the Complaint.

26. Plaintiff's claims are barred, in whole or in part, insofar as Plaintiff lacks standing to assert any or all of the claims alleged in the Complaint.

27. Some or all of Plaintiffs' state-law claims cannot be brought against Lincoln for a lack of standing. For instance, the laws of the states cited in Count II of the Complaint are not intended to, and do not, apply to conduct occurring outside of those states, and Plaintiffs' Complaint does not include any Plaintiff from the States of Alaska, Arizona, District of Columbia, Hawaii, Idaho, Indiana, Iowa, Kansas, Louisiana, Maine, Maryland, Michigan, Minnesota, Mississippi, Missouri, Montana, Nebraska, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, South Carolina, South Dakota, Utah, Vermont, Virginia, West Virginia, Wisconsin, and Wyoming.

28. Many of the state laws allegedly giving rise to Plaintiffs' claims do not apply because the alleged conduct did not occur within or substantially affect the citizens or commerce of the respective states, or because Lincoln had no specific intent to impact the commerce of those states. As a result, the application of those state laws to Lincoln's conduct would violate the Due Process Clauses and Commerce Clause of the U.S. Constitution, the principle of federalism, and the constitutions and laws of the respective states at issue.

29. Without admitting the existence of any contract, combination, or conspiracy in restraint of trade, and expressly denying same, Plaintiffs' claims are barred, in whole or in part, to the extent that Plaintiffs entered into contracts that do not include any purported overcharge.

30. To the extent that the Complaint seeks to assert claims or obtain relief on behalf of multifamily renters located outside of the jurisdictions governed by those laws, those claims are

barred due to Plaintiffs' lack of standing and any effort to enforce those laws as to residents of other states would violate the Due Process Clause and the Commerce Clause of the U.S. Constitution and various state laws and constitutions.

31. Some of Plaintiffs' state-law claims are barred, in whole or in part, to the extent Plaintiffs seek damages under state laws that do not permit recovery of damages by private plaintiffs.

32. Plaintiffs' claims are barred, in whole or in part, to the extent that Plaintiffs failed to comply with the notice requirements under various state laws.

33. Some or all of Plaintiffs' claims barred because all of Lincoln's conduct challenged by Plaintiffs was lawful, fair, non-deceptive, expressly authorized by law, justified, and pro-competitive; it constituted a bona fide business practice consistent with industry practices and was carried out in furtherance of legitimate business interests; and it was a part of Lincoln's lawful business operations.

34. Some or all of the respective state-law claims at issue cannot be, and were not intended to be, applied in the class-action context.

35. Plaintiffs' claims are barred, in whole and/or in part, because Lincoln's actions were not *per se* unlawful.

36. Plaintiffs' claims are barred, in whole and/or in part, because Lincoln's alleged conduct has not unreasonably restrained trade and was lawful, fair, non-deceptive, expressly authorized by law, justified, and pro-competitive, constituted bona fide business practices, and was carried out in furtherance of Lincoln's independent and legitimate business interests.

37. Plaintiffs' claims are barred, in whole and/or in part, because Lincoln and other Defendants do not possess market power, individually or collectively, in any relevant market.

38. Plaintiffs' claims are barred, in whole and/or in part, because there are no anticompetitive effects in any relevant geographic market, and Plaintiffs entered into contracts that do not include any purported overcharge.

39. Plaintiffs' claims are barred, in whole and/or in part, because Plaintiffs have not defined a proper relevant market for purposes of this action.

40. Plaintiffs' claims are barred, in whole and/or in part, because Plaintiffs cannot demonstrate the relevant product market should be limited to "the market for the lease of multifamily residential real estate."

41. Plaintiffs' claims are barred, in whole and/or in part, because Plaintiffs failed to allege a properly defined geographic market.

42. Plaintiffs' claims are barred, in whole and/or in part, because there is no contract, combination, or conspiracy that unreasonably restrains trade.

43. Plaintiffs' claims are barred, in whole and/or in part, because Lincoln has not formed an agreement or exchanged competitively sensitive information in any relevant market.

44. Plaintiffs' claims are barred, in whole and/or in part, because none of Lincoln's alleged actions or omissions that Plaintiffs challenge substantially lessened or otherwise harmed competition within any relevant market.

45. Plaintiffs' claims are barred, in whole and/or in part, because Plaintiffs have not suffered antitrust injury.

46. Plaintiffs' claims are barred, in whole and/or in part, because Plaintiffs lack standing, including antitrust standing, to assert their claims.

47. Plaintiffs' claims are barred, in whole and/or in part, because any alleged injury is too remote.

48. Plaintiffs' claim for damages is barred because their alleged damages, if any, are speculative and uncertain, and because of the impossibility of ascertaining and allocating their alleged damages.

49. Plaintiffs' claims are barred, in whole and/or in part, because Plaintiffs cannot satisfy the prerequisites set forth in Rules 23(a), 23(b)(2), and/or 23(b)(3) of the Federal Rules of Civil Procedure to maintain this action as a class action.

50. Plaintiffs are not entitled to injunctive relief because they have an adequate remedy at law.

51. Plaintiffs fail to allege facts sufficient to support any granting of injunctive relief. Plaintiffs' request for injunctive relief lacks the specificity required by the Federal Rule of Civil Procedure 65.

52. Plaintiffs' claims are barred, in whole and/or in part, because Plaintiffs are neither typical nor adequate representatives of the class seeking injunctive relief.

53. Plaintiffs' claims are barred, in whole and/or in part, under *Illinois Brick v. Illinois*, 431 U.S. 720 (1977).

54. Plaintiffs' claims are barred, in whole and/or in part, because the injuries alleged by Plaintiffs, to the extent any exist, were caused, in whole or in part, by the conduct of third parties for whom Lincoln was not responsible, through forces in the marketplace over which Lincoln has no control, and/or through acts or omissions on the part of one or more of the Plaintiffs.

55. Plaintiffs' claims are barred, in whole and/or in part, because Lincoln is not liable for the acts of any other Defendant.

56. Plaintiffs' state law claims are barred, in whole or in part, because some or all of the respective state-law claims at issue cannot be, and were not intended to be, applied in the class-action context.

57. Plaintiffs' claims are barred, in whole and/or in part, because Lincoln's alleged conduct is procompetitive.

58. Lincoln adopts and incorporates by reference any and all other defenses asserted by any other Defendant to the extent that the defense would apply to Lincoln.

59. Lincoln has not knowingly or intentionally waived any applicable defenses, and it reserves the right to assert and rely upon other applicable defenses that may become available or apparent during discovery in this matter. Lincoln reserves the right to amend or seek to amend its Answer and Affirmative Defenses.

Wherefore, Lincoln requests that all of Plaintiffs' claims be dismissed with prejudice and that judgment be entered in Lincoln's favor, with costs and fees awarded to Lincoln.

Dated: February 5, 2024

Respectfully submitted,

/s/ Gregory J. Casas

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*Counsel for Defendant Lincoln Property  
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## CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record registered on the CM/ECF system.

DATED this 5th day of February, 2024.

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*Ryan Holt*  
Ryan Holt